

RUHNKE & BARRETT
ATTORNEYS AT LAW

47 PARK STREET
MONTCLAIR, N.J. 07042
973-744-1000
973-746-1490 (FAX)

29 BROADWAY
SUITE 1412
NEW YORK, N.Y. 10006
212-608-7949

DAVID A. RUHNKE (davidruhnke@ruhnkeandbarrett.com) ♦ JEAN D. BARRETT (jeanbarrett@ruhnkeandbarrett.com)

REPLY TO **MONTCLAIR** OFFICE

LETTER-MOTION TO AMEND CONDITIONS OF RELEASE

May 8, 2020

Served and Filed Via ECF
Hon. Valerie E. Caproni, U.S.D.J.
Thurgood Marshal United States Courthouse
40 Foley Square
New York, N.Y. 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 05/08/2020

Re: *United States v. Jonathan Burgos*, 20-cr-00182 (VEC)

Dear Judge Caproni:

MEMO ENDORSED

I write, respectfully, seeking Your Honor's approval of a modification of Mr. Burgos's conditions of release. Specifically, I am requesting that the Court remove the conditions of home detention and location monitoring. I have discussed this proposal with Mr. Burgos' Pretrial Services Officer, Jonathan Lettieri. He supports the modification herein requested as appropriate. If this application is granted, Mr. Burgos would, of course, remain under PTS supervision and all other conditions of release would remain in effect.

By way of context, Mr. Burgos is one of four defendants named in a one-count indictment alleging narcotics trafficking in the Bronx. The indictment charges a conspiracy to distribute substances "containing a detectable amount of cocaine," in violation of 21 U.S.C. § 841(b)(1)(C). Such a violation carries no mandatory term of imprisonment. My client has been on release status since the day of his arrest, February 11, 2020, under conditions agreed to by the United States. Those conditions include a PRB of \$75,000 with two co-signers, home detention, electronic monitoring, and supervision by Pretrial Services.

Mr. Burgos is presently and gainfully employed, and has been for the past several years, performing clean-up and maintenance work. He is about to take on a second job. He pays child support via payroll deduction. His job placements have

RUHNKE & BARRETT
ATTORNEYS-AT-LAW

HON. VALERIE E. CAPRONI, U.S.D.J.
MAY 8, 2020—PAGE 2

been approved by Pretrial. As noted earlier, Pretrial is of the view that the home confinement and location monitoring conditions are no longer needed.

Should Your Honor wish to hear from the parties on this proposal, it is my respectful request that both myself and my client be allowed to participate telephonically.

Your Honor's time and attention to this matter are appreciated.

Respectfully submitted,

/s/

David A. Ruhnke

Via ECF: Juliana Murray, AUSA

Via email: Jonathan Lettieri, Pretrial Services

Application GRANTED.

SO ORDERED.

Date: 05/08/2020



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE